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THE SECRETARY - ROOM 222

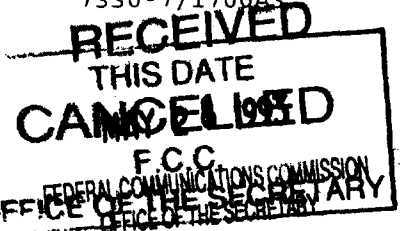
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IN REPLY REFER TO:
7330-7/1700A3



Honorable Thad Cochran
United States Senate
Washington, D.C. 20510

Dear Senator Cochran:

This is in response to your letter of May 10, 1993, in which you inquired on behalf of your constituent, Mr. Gregory Sakala, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). Mr. Sakala is specifically concerned about the potential impact of our final rules on radio remote controlled airplane hobbyists.

Model airplane users have shared spectrum on a secondary basis with industrial users for over 25 years. The low power industrial user and the radio control model airplane hobbyists effectively share spectrum through geographic

Congressional

DUE 5-27-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,
AND REPLY FOR DOCKET FILE. ROOM 222.

THAD COCHRAN
MISSISSIPPI

United States Senate

WASHINGTON, DC 20510-2402

May 10, 1993

PRB
92-235
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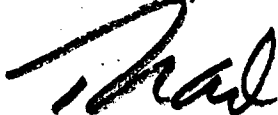
Mrs. Lou Sizemore, Congressional Liaison
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

Dear Lou:

Enclosed is correspondence sent to me by one of my constituents, Mr. Gregory Sakala concerning proposed new rule making NPRM-PR Docket 92-235. As a courtesy to me, I would appreciate a written response at your earliest convenience.

Any assistance you can provide Mr. Sakala would be deeply appreciated.

Sincerely,



THAD COCHRAN
United States Senator

TC/mp
Enclosure

1501 Hide-A-Way Lane
Carriere, MS 39426
30 April 1993

Senator Thad Cochran
United States Senate
Washington, DC 20510

Dear Sir:

I'm writing again to express my continuing concern over the Federal Communication Commission's proposed new rule making (NPRM-PR Docket 92-235) concerning frequency restructuring, specifically changes to Part 88 and Part 95.

I wish to thank you and your staff for the assistance you have already given me and my hobby on this matter. I have reviewed the letter and other information you have forwarded to me from Mr. Ralph Haller of the FCC. After the review, I feel that the FCC does not understand what we as the R/C community are fearful of happening.

The FCC as the Government Agency that oversees and regulates frequency allotment and use, should understand the necessity of maintaining CLEAR channels that are free of interference. The proposed changes would do just the opposite. First, it would allow mobile transmitters (up to 1 watt output) with four times the power output that Remote Control Radio transmitters (normally about 1/4 watt output) at frequencies that are only 2.5 kHz away from our assigned frequencies. Second, the technical specifications in 92-235 proposed for these new mobile transmitters would grant LEGAL frequency tolerances of 3.6 kHz, and that would allow their transmission signals directly on TOP OF OUR assigned frequencies.

This interference JAMMING of our assigned frequencies will create a safety hazard of unreasonable proportions. Let me explain my point; I personally fly many large model aircraft, that by the way are becoming more and more common in the hobby. My personal model aircraft have wing spans that range from a minimum of 6 ft. up to 10 ft., with one under construction with a wing span of 12 ft.. These miniature aircraft weigh from 5 pounds up to around 25 pounds, and fly at speeds of from 50 to 100 mph. I must point out that my models are not fast by today's standards, many models flown today can exceed 150 mph with ease. Do you have any idea what damage a 5 pound object moving at 50 mph can do? Then try to think of the damage a 25 pound object moving at 100 mph could do! Loosing control of one of these miniature aircraft due to frequency JAMMING would be totally unacceptable.

Let me put this another way; lets pretend that the Department of Transportation was being pushed by "interested industry" to double the total number of traffic lanes on the interstate highway system. Since the average interstate highway traffic lane is now 14 ft. wide and the average compact car is only 6 ft. wide, the simple solution to the problem is to reduce the traffic lanes to 7 ft. wide, this way DOT can double the total number of traffic lanes. True every one will have to be much more careful driving, but the 8 ft. wide trucks should cause only minor interference and occasional accidents can be tolerated! This is exactly the type of thinking the FCC is doing.

Mr. Haller's information package contains a question answer sheet, and I find fault with many of the answers provided.

1) I fully understand that as an unlicensed operator, I must accept interference from the current fixed and mobile operators. At my club's flying site channel 44 experiences occasional interference, and for that reason is banned from used at my club's flying site. That is only one channel out of 59 assigned channels with the now existing 10 kHz frequency spacing between R/C channels and the fixed/mobile channels. With the proposed 2.5 kHz spacing we could loose the use of up to 2/3 of our assigned frequencies.

2) We do not just APPARENTLY believe this would make many of our frequencies unusable, we KNOW this could make many of our frequencies unsafe to use. Fixed stations are not at question, as we can and do live with them because they are a known, unmoving and understood

hazard. The problem is that MOBILE means just that, it's mobile; when and how are we to know then a mobile transmitter is in operation with in range to override our signal?

3) True that we are allowed by regulation to transmit with an output of up to 3/4 watt, but most if not all R/C transmitters output at 1/4 watt or less. This makes the comparison of our 3/4 watt to the proposed 1 watt meaningless. The statement that a factory and a radio control hobbyist would not share a channel under this proposal is misleading due to the above described 3.6 kHz allowable frequency tolerance. Beside that statement, would not a factory be using a FIXED transmitter instead of a MOBILE transmitter.

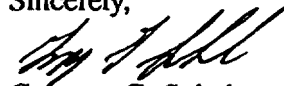
4) The separation of 2.5 kHz between the proposed new mobile frequencies and the existing R/C model frequencies might be workable if the allowable frequency tolerance for the mobile transmitters was tightened up to less than half of the proposed separation, that is 1.25 kHz in place of the proposed 3.6 kHz.

5) The author of this is wrong in stating that R/C models are not operated near factories or construction sites, the exact opposite is often true, Lets turn this around, how would you like to see an overhead crane move or drop a load due to it being operated on of frequency to close to a R/C Model frequency?

6) Safety should be one of the prime considerations when reviewing the proposed changes to the 72 - 76 MHz band. The statement by the author that the proposed changes would have minimal or no impact, and cause no harm to all existing users is very short sighted and possibly in grave error.

Again I wish to say thank you for the help you and your staff have already been on this issue. I look forward to your reply.

Sincerely,



Gregory G. Sakala